

April 14, 2011

Jennifer Johnson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 20551

**Re: Docket No. R-1408
RIN No. 7100-AD67**

VIA ELECTRONIC MAIL: regs.comments@federalreserve.gov

Dear Ms. Johnson,

The Michigan Credit Union League (MCUL) appreciates the opportunity to comment on the Federal Reserve Board's (the Board) proposed amendments to the model adverse action notices under Regulation B of the Equal Credit Opportunity Act. MCUL is a statewide trade association representing 95% of the credit unions located in Michigan.

MCUL understands that the proposed changes to the content of the adverse action notice model forms are required as a result of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act), and the opportunity for change is unlikely. However, it is important to note that these changes, while seemingly small compared to a major update, represent additional time and expense to implement including among other things, time and expense for training and related software updates. These incremental changes have continued to build and aggregate into compliance mandates that are diverting important resources for all institutions, and strangling smaller institutions!

This proposal calls for disclosure of the credit score and "information relating to credit scores" if a credit score is used in taking adverse action. The current model forms (C-1, C-2 and C-3) already contain the principal reasons for the adverse action, such as: "delinquent past or present credit obligations with others;" "collection action or judgment;" "garnishment or attachment;" "foreclosure or repossession;" "bankruptcy;" and "number of recent inquiries on credit bureau report." As each of these items has a direct impact on a consumer's credit score, MCUL believes it is unnecessarily duplicative for financial institutions to have to also list out later in the forms the "Key factors that adversely affected your credit score."

As to the Board's specific question regarding whether "additional or different changes to the model notices should be adopted," MCUL does not support including any additional content in the model forms than what has already been mandated by the Dodd-Frank Act. Weighing down disclosures with ever increasing information in order to better inform consumers does not ensure that the consumer will read the disclosures that financial institutions are continually required to provide.

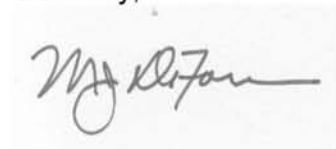
MCUL strongly urges the Board to consider the real-world impact that all of these regulatory changes have on financial institutions. Consumers are not being served when financial

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institutions have to expend the majority of their time and resources ensuring compliance with ever-increasing regulatory compliance burdens.

MCUL appreciates the opportunity to provide comment on this proposed rule.

Sincerely,

A handwritten signature in black ink, appearing to read "M. DeFors", is written over a light gray rectangular background.

Michael J. DeFors
VP Regulatory Affairs
MCUL & Affiliates